REMARKS

Claims 1-16, as amended, remain herein.

Claims 1-16 have been amended to recite more clearly applicants' invention.

A replacement Declaration and Power of Attorney document will be filed under separate cover.

1.   Claims 1, 2, 4-9 and 11 were rejected under 35 U.S.C. §102(b) over Nixon et al. U.S. Patent 5,801,942.

The presently claimed programming station is for generating an automation program to be executed in automation equipment and written in at least one graphic automation language, the programming station comprising an internal memory for storing a plurality of grammar files all written in a same, hierarchical and object oriented language in text format, each grammar file comprising a description grammar describing a respective graphic automation language for generating an automation program. This arrangement is nowhere disclosed or suggested in the cited reference.

Nixon '942 discloses a process control system which supports multiple IEC-1131 standard control languages, and user-

selection from among a plurality of standard control languages, to implement a control strategy. While Nixon '942, column 7, line 65-column 8, line 67, describes a system wherein an operator workstation 102, a laboratory workstation 104 and an engineering workstation 106 all connected by a LAN can transfer a process program 112 among each other, and column 8, lines 59-67 describe use of templates, libraries, etc., located at a given workstation for generating an user's view of process 112 appropriate to a specific workstation. Column 10, lines 42-65 describes a download language for creating instances, definitions and the like from a downloaded Device Table, as well as configuration information, which together are activated to produce a local view of program 112.

However, while Nixon '942 discloses multiple files corresponding to applicants' grammar files, each comprising description of a respective graphic automation language, and one or more of such files can be located at a given workstation with means for converting each application description file into a binary language that can be executed by an automation equipment, Nixon '942 does <u>not</u> describe such grammar files (using any

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descriptive wording) each comprising a description of a respective graphic automation language for generating an automation program, wherein all such grammar files are written in a <u>same</u>, hierarchical and object oriented language in text format, as presently claimed. Nixon '942 does <u>not</u> describe all of the graphic automation language grammar files as written in one, single common hierarchical and object oriented language. In effect, that common language becomes a neutral file format for all of the graphic automation language grammar files. Nixon '942 does <u>not</u> disclose such a neutral file format for the graphic automation language grammar files, when located in a programming station for generating an automation program to be executed in automation equipment.

For the foregoing reasons, Nixon '942 fails to disclose all elements of applicants' claimed invention, and therefore is not a proper basis for rejection under §102. And, there is no disclosure or teaching in Nixon '942 that would have suggested the desirability of modifying any portions thereof effectively to anticipate or suggest applicants' presently claimed invention. Claims 2 and 4-9, which depend from claim 1, are

allowable for the same reasons described herein for claim 1. Claim 11 is allowable for the same reasons described herein for claim 1. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

2. Claims 1 and 11-13 were rejected under 35 U.S.C. §102(e) over Lawrence et al. U.S. Patent 6,393,341.

Lawrence '341 describes an architecture neutral device abstraction layer for interfacing devices and applications. It permits applications, without modification, to operate with any type of utility meter. Lawrence '341 describes interface 20 as including an abstraction layer 23, acting as a translator for allowing a given application 10 to communicate with any type of utility meter 30. Lawrence '341, column 3, lines 13-38, describes application 10 communicating with interface 20, which communicates with meter 30, and interface 20 converting requests, calls, and the like issued from application 10 and passing a translated version of such to meter 30. Lawrence '341, column 3, lines 58-67, describes interface 20 as including a meter description repository 26, wherein abstraction layer 23

functions as a façade for meters 30 and uses description repository 26 for translating requests from application 10 into the proper form for a particular meter 30.   Lawrence '341, column 4, lines 5-6, states that description repository 26 can be implemented in a single, hierarchical object oriented language, such as XML.

However, such abstraction layer and description repository are not files describing a respective graphic automation language for "generating" an automation program.   Instead, Lawrence '341, column 3, lines 60-62, describes abstraction layer 23 using description repository 26 for "translating requests" from a user-defined application 10.   Such application 10 already exists.   Abstraction layer 23 using description repository 26 is not used for writing application 10 in a graphic automation language.   Thus, Lawrence '341 does not disclose files describing a respective graphic automation language for generating an automation program, wherein all such files, or "grammar files", are written in a same, hierarchical and object oriented language in text format, as presently claimed.

For the foregoing reasons, Lawrence '341 fails to disclose all elements of applicants' claimed invention, and therefore is not a proper basis for rejection under §102. And, there is no disclosure or teaching in Lawrence '341 that would have suggested the desirability of modifying any portions thereof effectively to anticipate or suggest applicants' presently claimed invention. Claims 1 and 11 are allowable for the same reasons described herein; and claims 12 and 13, which depend from claim 11, are allowable for the same reasons described herein for claim 11. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

3. Claims 3 and 10 were rejected under 35 U.S.C. §103(a) over Nixon '942 and Lawrence '341.

Claims 3 and 10, which depend from claim 1, are allowable for the same reasons described herein for claim 1.

Moreover, the Office Action <u>admits</u> that Nixon '942 does <u>not</u> disclose the XML language and cites Lawrence '341 as allegedly disclosing same. And, Lawrence '341 does <u>not</u> provide the deficiencies of Nixon '942 described herein.

For the foregoing reasons, neither Nixon '942 nor Lawrence '341 contains any teaching, suggestion, reason, motivation or incentive that would have led one of ordinary skill in the art to applicants' claimed invention. Nor is there any disclosure or teaching in either of these references that would have suggested the desirability of combining any portions thereof effectively to anticipate or suggest applicants' presently claimed invention. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

4. Claim 10 was rejected under 35 U.S.C. §103(a) over Nixon '942, Lawrence '341 and Lau U.S. Patent 6,598,219.

Claim 10, which depends from claim 1, is allowable for the same reasons described herein for claim 1.

Moreover, the Office Action admits that Nixon '942 does not disclose the XML language and cites Lawrence '341 as allegedly disclosing same. The Office Action does not describe how Lau '219 plays a part in this rejection. And, Lawrence '341 and Lau '219 do not provide the deficiencies of Nixon '942 described herein.

For the foregoing reasons, none of Nixon '942, Lawrence '341 or Lau '219 contains any teaching, suggestion, reason, motivation or incentive that would have led one of ordinary skill in the art to applicants' claimed invention. Nor is there any disclosure or teaching in any of these references that would have suggested the desirability of combining any portions thereof effectively to anticipate or suggest applicants' presently claimed invention. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

5.   Claims 14 and 16 were rejected under 35 U.S.C. §102(b) (understood to be 35 U.S.C. §103(a)) over Lawrence '341 and Nixon '942.

Claims 14 and 16, which depend from claim 11, are allowable for the same reasons described herein for claim 11.

Moreover, the Office Action <u>admits</u> that Lawrence '341 does <u>not</u> disclose graphic automation languages written in the XML language and cites Nixon '942 as allegedly disclosing same. And, Nixon '942 does <u>not</u> provide the deficiencies of Lawrence '341 described herein.

For the foregoing reasons, neither Lawrence '341 nor Nixon '942 contains any teaching, suggestion, reason, motivation or incentive that would have led one of ordinary skill in the art to applicants' claimed invention. Nor is there any disclosure or teaching in either of these references that would have suggested the desirability of combining any portions thereof effectively to anticipate or suggest applicants' presently claimed invention. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

6. Claim 15 was rejected under 35 U.S.C. §102(b) (understood to be 35 U.S.C. §103(a)) over Lawrence '341, Nixon '942, and Lau '219.

Claim 15, which depends from claim 11, is allowable for the same reasons described herein for claim 11.

Moreover, the Office Action admits that Lawrence '341 and Nixon '942 do not disclose means of checking that the description of the application in the XML language satisfies the description grammar of the graphic automation language used, and cites Lau '219 as allegedly disclosing same. And, Lau '219 and

Lau '219 do <u>not</u> provide the deficiencies of Lawrence '341 and Nixon '942 described herein.

For the foregoing reasons, none of Nixon '942, Lawrence '341 or Lau '219 contains any teaching, suggestion, reason, motivation or incentive that would have led one of ordinary skill in the art to applicants' claimed invention. Nor is there any disclosure or teaching in any of these references that would have suggested the desirability of combining any portions thereof effectively to anticipate or suggest applicants' presently claimed invention. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

All claims 1-16 are now proper in form and patentably distinguished over all grounds of rejection cited in the Office Action. Accordingly, allowance of all claims 1-16 is respectfully requested.

Should the Examiner deem that any further action by the applicants would be desirable to place this application in even better condition for issue, the Examiner is requested to telephone applicants' undersigned representatives.

Respectfully submitted,

PARKHURST & WENDEL, L.L.P.

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Date

Roger W. Parkhurst
Registration No. 25,177
Robert N. Wieland
Registration No. 40,225

RWP:RNW/mhs

Attorney Docket No.: SCHN:018

PARKHURST & WENDEL, L.L.P.
1421 Prince Street, Suite 210
Alexandria, Virginia 22314-2805
Telephone: (703) 739-0220

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